

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

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	:	
CACHET FINANCIAL SERVICES,	:	
	:	
Plaintiff,	:	Civil Action No. 19-CV-1181-FJS-
	:	CFH
-against-	:	
	:	
MYPAYROLLHR, LLC; MICHAEL MANN;	:	
VALUEWISE CORPORATION; ROSS PERSONNEL	:	
CONSULTANTS INC.; SOUTHWESTERN	:	
PAYROLL SERVICES INC.; ESSQUE, INC. (D/B/A	:	
HEUTMAKER BUSINESS ADVISORS); AND DOES	:	
1-10,	:	
	:	
Defendants.	:	
-----X	:	

**NOTICE OF MOTION FOR ENTRY OF DEFAULT JUDGMENT AGAINST
DEFENDANTS MYPAYROLLHR, LLC, MICHAEL MANN, VALUEWISE
CORPORATION, AND ROSS PERSONNEL CONSULTANTS INC.**

PLEASE TAKE NOTICE that on February 24, 2020, Plaintiff Cachet Financial Services filed a Motion for Entry of Default Judgment against Defendants MyPayrollHR, LLC; Michael Mann; Valuewise Corporation; and Ross Personnel Consultants Inc. ("Motion") pursuant to Fed. R. Civ. P. 55(a) and L.R. 55.2(b).

PLEASE TAKE FURTHER NOTICE that the return date for the Motion is April 16, 2020 pursuant to the scheduled motion dates of The Honorable Christian F. Hummel, Magistrate Judge. Any party opposing the Motion shall file its opposition papers by no later than seventeen days prior to the return date of the Motion. *See*, Local Rule 7.1(b)(1).

PLEASE TAKE FURTHER NOTICE that your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one. (If you do not have an attorney, you may wish to consult one.)

CERTIFICATE OF SERVICE

I hereby certify that on February 24, 2020 I electronically filed the foregoing with the Clerk of the District Court using the CM/ECF system, which sent notification of such filing to the following:

1. Southwestern Payroll Services Inc., d/b/a Southwestern Payroll
2. Essque, Inc., d/b/a Heutmaker Business Advisors

And, I hereby certify that I have mailed by the United States Postal Service the document to the following non-CM/ECF Participants, with an electronic courtesy sent via email to:

1. MyPayrollHR, f/k/a Cloud Payroll LLC
2. Michael Mann
3. ValueWise Corporation
4. Ross Personnel Consultants Inc., d/b/a Ross Consultants

c/o Micahel L. Koenig
Hinckley Allen
30 South Pearl Street, Suite 901
Albany, New York 12207
mkoenig@hinckleyallen.com

Dated: Los Angeles, California
February 24, 2020

/s/ Donald A. Miller
Donald A. Miller